

157810
VOLKSWAGEN

20 February 2002

RECEIVED INFORMATION

02 FEB 25 11 51:17



11157-22

Mr. Stephen R. Kratzke
Associate Administrator
for Safety Performance Standards
Room 5401
National Highway Traffic
Safety Administration
400 Seventh St., S.W.
Washington, D.C. 20590

Safety Affairs and

Vehicle Testing

Mail Code 3C02
3800 Hamlin Road
Auburn Hills, MI 48026
Tel. (248) 754-5000
Fax (248) 754-5099

Subject: Docket 01-11157; FMVSS 110, 117, 120, 129, 139 and Part 567, 574, 575 (Tire Labeling, Vehicle Labeling and Tire Information Regulations; Notice of Proposed Rulemaking published in the Federal Register December 19, 2001)

Dear Mr. Kratzke:

These comments to the subject Notice are submitted by Volkswagen AG, Audi AG and Volkswagen of America, Inc. (Volkswagen).

Volkswagen participated in the preparation of the comments submitted by the Alliance of Automobile Manufacturers (Alliance), but would like to submit some additional points of special emphasis regarding the proposed vehicle placard/tire inflation pressure label and owner's manual requirements.

TIRE SIDEWALL LABELING

The Alliance comment recommends that tire sidewall labeling for tire speed rating and load index be allowed. Volkswagen would like to emphasize the need for the speed rating to be identified on each tire. Volkswagen owner's manuals include tire speed rating information with the warning never to operate the vehicle at speeds greater than the maximum speed rating of the tires with which it is equipped. Volkswagen believes that owners should pay attention to the tire speed rating on the original equipment tires and when ordering replacement tires.

VEHICLE LABEL

The NHTSA proposes a multi-color label with a location restriction on the driver's side B-pillar or driver side door edge. The label content is limited to the tire size designation and applicable pressures for the tires actually mounted on the vehicle by the manufacturer. The label contents may be divided by the manufacturer at its option into two labels (a vehicle placard and a tire inflation pressure label). For vehicles other than passenger cars, the provisions currently in FMVSS 120 requiring the identification of appropriate tire and rim combinations applicable to the vehicle and the GVWR and GAWR would be incorporated into FMVSS 110, which Standard would now be applicable to all classes of motor vehicles with GVWR of 10,000 pounds or less.

Label Configuration

Volkswagen supports the option in proposed S4.3 of FMVSS 110 to separate the required items of information (a) through (g) into two separate labels as it provides manufacturers flexibility in the event of space restrictions which limit the size of the label that can be provided. Volkswagen supports the Alliance proposal to permit the vehicle seating capacity and vehicle capacity weight information to be located on the Part 567 certification label as an additional option.

However, Volkswagen recommends that the tire symbol or icon not be required on the vehicle label that shows only the seating capacity and the vehicle capacity weight, whether the certification label or a separate label is used. The tire symbol or icon takes up valuable space and is not meaningful since the seating capacity and vehicle capacity weight information is not strictly just tire related.

Label Color

As stated in the comments submitted by the Alliance, the multi-color requirement is not necessary to fulfill the purpose of the label. This requirement would present a significant cost burden without corresponding benefit. The tire information label is not a caution or warning label such as the air bag sunvisor labels, but provides information to owners as needed when checking their vehicle tire pressures. The label can be located by reference to the owner's manual or by checking the vehicle for the available location. The addition of coloring will not help in transmitting the information or in locating the label.

Volkswagen and Audi are currently implementing processes where the vehicle information labels are printed on sheets of material that have a uniform background color with the information printed in black. A requirement for coloring on the tire information label would require that the tire information label be separately produced and processed.

Label Location

Volkswagen acknowledges the desire to provide reasonable uniformity for the tire pressure information label location. However, the limitation to the driver side door or driver side B-pillar area is restrictive, and the passenger side front door or B-pillar area should also be acceptable. As proposed in the Alliance comment, manufacturers should have the option of using the Part 567 certification label for part of the tire placard information. In addition, Volkswagen proposes that manufacturers should be provided the option of moving the certification label to the passenger side in order to be able to accommodate the tire information placard on the driver side as the primary location. If a manufacturer utilizes the option of including some of the tire placard related information on the certification label, then the certification label and the tire inflation pressure information label should be on the same side of the vehicle. Similarly, if a manufacturer utilizes the option of breaking the tire placard information into two separate labels as proposed by NHTSA, then both of those labels should be on the same side of the vehicle.

The Alliance comment proposes that the Part 567 language be utilized for prescribing the label location requirements and if this is adopted, Volkswagen recommends a clarification to one portion of the language. The Part 567 phrasing includes the words "the label shall be affixed to the inward-facing surface of the door next to the driver's seating position." If this wording is adopted as proposed by the Alliance, it should be clarified that the surface of the door, such as that adjacent to the instrument panel, which is not normally visible when the door is closed is included as an allowable location. Placing a tire information label on any other inward surface of the driver door, where it is continually visible, would not be practicable or design-acceptable for most vehicles.

Label Content

NHTSA proposes to incorporate as section S4.3.1 in FMVSS 110 additional labeling requirements for vehicles other than passenger cars based on requirements currently in FMVSS 120, S5.3. However, the proposed language in S4.3.1 is more restrictive than the FMVSS 120 requirement in that the tire and rim information would have to be on the Section 567.4 or 567.5 certification label. FMVSS 120 currently permits this information to be either on the certification label or on a tire information label. Volkswagen suggests

that the provisions in FMVSS 120 permitting the tire and rim combination and vehicle weight information to be either on the certification label or on a separate tire information label be carried over into the new requirements of FMVSS 110. Accordingly, Volkswagen recommends that NHTSA add wording to the proposed S4.3.1 of FMVSS 110 stating that:

At the option of the manufacturer, the information may be included on the certification label required by section 567.4 or 567.5 or on the tire information placard or tire inflation pressure label specified in S4.3 of this Standard.

The proposed requirements for the label and also the owner's manual text would require identification of the tire size designation for the tire installed as original equipment on the vehicle. Provisions for identifying optional or alternative tire size information is not included in the proposed regulatory language.

As stated in the Alliance comments, manufacturers often provide optional tire sizes, and the proposed requirement that would mandate the matching of a specific tire information label and a specific owner's manual or document insert with a specific vehicle would be unnecessarily burdensome and totally impracticable in production. Volkswagen recommends that the vehicle information label be permitted to identify optional tire sizes provided by the vehicle manufacturer. Since owner's manuals are printed at the beginning of the production year, and because available tire sizes could change any time during the production cycle, it is recommended that owner's manual information not be required to identify a specific tire size for the vehicle. Manufacturers should, however, be able to include owner's manual information identifying available tire options or recommended alternative tire sizes for replacement equipment at their discretion. Volkswagen does not believe, as stated by NHTSA, that the listing of multiple tire sizes on vehicle tire information labels or in owner's manual information presents any problem. In fact, it is useful information since an owner may select an optional tire size as replacement equipment, and in that event, the tire pressure information will be readily available on the vehicle label.

Owner's Manual Content

The NPRM proposes owner's manual content requirements and a standard text that could be made mandatory describing "Steps for Determining Correct Load Limit". Volkswagen does not oppose standardized text for generic information, but manufacturers should not be restricted from providing appropriate and relevant additional information on tire use, installation, and related operating recommendations in the owner's manual or in other vehicle documentation.

Please contact me for any additional information or clarification of these comments.

Sincerely,

VOLKSWAGEN OF AMERICA, INC.

A handwritten signature in black ink, appearing to read "Dietmar K. Haenchen", with a stylized, flowing script.

Dietmar K. Haenchen

Process Leader

Safety Affairs and Vehicle Testing

cc: Docket Management (10 copies)
R. Kurrus